

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

Carlos Holguin (CSB No. 90754)

Peter A. Schey (CSB No. 58232)

256 S. Occidental Blvd.

Los Angeles, CA 90057

Telephone: (213) 388-8693, ext. 302

Facsimile: (213) 386-9484

Email: crholguin@centerforhumanrights.org

GIBBS, HOUSTON PAUW

Robert H. Gibbs (WSBA 5932)

Robert Pauw (WSBA 13613)

1000 Second Ave. Suite 1600

Seattle, WA 98104

Telephone: (206) 224-8790

(*Pro Hac Vice*)

ASIAN LAW CAUCUS

Ivy Lee

720 Market Street

San Francisco, CA 94102

Telephone: (415) 391-1655

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
WESTERN DIVISION

CATHOLIC SOCIAL SERVICES, INC.,—
IMMIGRATION PROGRAM, *et al.*,

Plaintiffs,

- vs -

JANE NAPOLITANO, SECRETARY, U.S.
DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Defendants.

) Case No. Civ S-86-1343-LKK
)
) STIPULATION EXTENDING TIME TO FILE
) OBJECTIONS TO AFFIDAVIT RE: FOREIGN
) FILERS; ORDER THEREON.

)
)
) Hearing: None
) Time: n/a
)
)
)

Pursuant to the Court's order of December 14, 2009, defendants timely filed an affidavit setting out their efforts to advise class members whose legalization applications

1 CIS rejected because they now reside abroad of their right to seek special master review
2 of the CIS's action. The Court's order granted plaintiffs until January 22, 2010, to file
3 objections to defendants' affidavit; that date was thereafter extended pursuant to
4 stipulation to February 19, 2010, to allow the parties discuss resolving their differences
5 over a remedy for rejected foreign filers, as well as for class members whose
6 applications CIS declared abandoned pursuant to 8 C.F.R. § 103.2(b)(13). Those
7 discussions are continuing, and plaintiffs accordingly seek to extend the deadline for
8 filing plaintiffs' objections an additional three weeks.
9

10 / / /
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2 Accordingly, IT IS HEREBY STIPULATED, by and between the undersigned counsel
3 for plaintiffs and defendants, that the deadline for filing plaintiffs' objections to
4 defendants' affidavit re: foreign filers be extended to March 12, 2010.

5 Dated: February 17, 2010.

CENTER FOR HUMAN RIGHTS AND
CONSTITUTIONAL LAW
Carlos R. Holguín
Peter A. Schey

6
7
8 GIBBS, HOUSTON PAUW
Robert H. Gibbs
Robert Pauw
9 /s/

10 Carlos Holguín
11 *Attorneys for plaintiffs*

12 Dated: February 17, 2010.

LAWRENCE G. BROWN
United States Attorney

13 TONY WEST
14 Assistant Attorney General
15 Civil Division

16 TERRI J. SCADRON
Assistant Director

17
18 /s/
19 ANTHONY W. NORWOOD
20 U.S. Department of Justice
21 Office of Immigration Litigation
22 P.O. Box 878, Ben Franklin Station
23 Washington, D.C. 20044
24 Telephone: (202) 616-4883
25 Attorneys for Defendants
26 *(per email authorization)*

27 IT IS SO ORDERED.

28 Dated: February 18, 2010.

/s/Frank C. Damrell, Jr.
FRANK C. DAMRELL, JR. for
LAWRENCK K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT